

Exhibit E

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

OCLC, Inc.,

Plaintiff,

v.

**CLARIVATE, PLC; CLARIVATE
ANALYTICS (US) LLC; PROQUEST
LLC; and EX LIBRIS (USA), INC.,**

Defendants.

Case No. 2:22-cv-2470-JLG-KAJ

Judge James L. Graham

Magistrate Judge Kimberly A. Jolson

NOTICE OF DEPOSITION

Pursuant to Federal Rule of Civil Procedure 30(b)(6), counsel for Plaintiff OCLC, Inc. (“OCLC”) will take the deposition of the designated representative(s) of Defendants Clarivate, Plc, Clarivate Analytics (US) LLC, ProQuest LLC, and/or Ex Libris (USA), Inc. beginning at 9:00 a.m. on June 28, 2022 at a location agreed upon by the parties. OCLC will take the deposition of the designated representative(s) on the matters below and on reasonably related matters from day to day until completed. The deposition will be taken before an officer appointed or designated to administer oaths and will be transcribed by stenographic means. This deposition is being taken for the purposes of discovery, for use at the preliminary injunction hearing, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure and the local rules.

MATTERS UPON WHICH TESTIMONY IS SOUGHT

1. Defendants’ corporate structure, including Defendants’ subsidiaries, affiliates, and related entities and those entities’ involvement in the development, strategy, marketing, design, operation, implementation, and/or oversight of MetaDoor;

2. Agreements, contracts, terms, and/or consent forms provided to and/or executed by Defendants and OCLC WorldCat® Customers/Members related to MetaDoor, including the MetaDoor Consent Form;

3. OCLC WorldCat® Customers/Members that have downloaded, linked to, uploaded, and/or otherwise transferred their bibliographic records and/or associated metadata to Defendants and/or MetaDoor;

4. The agreements between Defendants and MetaDoor's Development Partners, and the Development Partners' involvement, participation, and contribution related to the development, strategy, marketing, design, operation, implementation, and/or oversight of MetaDoor, including University of Minnesota, Southern Methodist University, Brandeis University, University of Delaware, Swiss Library Service Platform, the National Library of Israel, Washington Research Library Consortium and its individual partners, Florida Gulf Coast University, and the University of Tennessee – Chattanooga;

5. The design and operation of MetaDoor, including how records, bibliographic information, and/or metadata are submitted to, merged to, linked to, uploaded to, transferred to, indexed, scored, and/or used by MetaDoor.

Respectfully submitted,

Dated: June 13, 2022

/s/ Traci L. Martinez

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CERTIFICATE OF SERVICE

On June 13, 2022, this document was filed electronically with the Clerk of the United States District Court for the Southern District of Ohio, Eastern Division, which will electronically serve a copy of the foregoing on all counsel of record for all parties. Additionally, this document was sent by email to the following counsel for Defendant and will be served upon the parties with the summons and complaint in this matter:

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/s/ *Traci L. Martinez*

One of the Attorneys for Plaintiff